

The RM-11392 petition is very bad for the Amateur Radio Service.

The RM-11392 petition seeks to destroy digital data technology advancement in the Amateur Radio Service.

The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.

The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.

Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.

The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz.

Thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.

The RM-11392 petition is comparatively similar to an Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone service. The fact is, Amateur Radio is now using faster time-multiplexing digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division techniques require at least 3kHz of bandwidth.

RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

The objectives of the petition would kill the only 24/7 HF emergency data ham radio service that can be accessed without an external computer.

The RM-11392 petition is simply a selfish attack by an individual who wants us to use only 20th Century "frequency-division" techniques. He is trying to eliminate new innovative 21st Century "time-division" techniques from the ham bands. Please don't allow him to succeed.

The RM-11392 petition seeks to re-define an automatically controlled data station. The present definition has served the amateur radio service very well. Please do not change it in the way the petitioner seeks. Instead, please expand the subbands for automatically controlled data stations. The automatically controlled data station subbands are already too narrow on the 40 meter band (5kHz), the 80 meter band (15kHz), and the 17 meter band (5kHz).

I use automatically controlled data stations and networks on the HF amateur radio bands very often. The ability to have wider bandwidths and freedom to pick any clear frequency in the data subbands is essential for the effective operation of these systems. The services these systems provide are essential for emergency communications, furthering the purpose of amateur radio, and they are part of amateur radio's reason to exist. Please do not limit their bandwidth or spectrum any further than the existing rules already do. If anything, please expand the automatic subbands, because there has been a very large increase in use of these as technology has advanced since the rules were written.

Please do not implement any of the provisions of the RM-11392 petition. They would set ham radio back to the stone age of HF digital data communications.

The RM-11392 petition is very bad for the Amateur Radio Service.

The RM-11392 petition seeks to destroy 21st century digital data technology advancement in the Amateur Radio Service. Please do not turn back the clock on digital data to the 20th century.

I favor the present FCC rules which provide few limitations on bandwidth of digital data signals. This encourages amateur radio operators to advance the state of the art of digital technology.

In today's amateur radio digital environment, the 300 baud symbol rate limit prevents USA amateur radio operators from communicating with some of the digital transmissions that amateurs of other countries are presently using. Please abolish this antiquated rule.

Please abolish the 300 baud symbol rate limit, because it prevents the amateur radio service from utilizing existing federal standard digital data methods for interoperation, inter-service compatibility, economical equipment, and common signalling methods.

The petition suggests that Pactor II is just as spectrally efficient and that Pactor III's increased bandwidth under favorable propagation conditions is inherently bad. Both arguments ignore the increased throughput and correspondingly shorter transmission time that go with higher speed and bandwidth. Fixed-length messages take less time to transmit at higher speeds, leaving the frequencies clear for longer periods of time.

Passage of RM-11392 would have very significant effects on both public safety and for promotion of the art of amateur radio.

Many persons, including myself, use digital modes for communication on amateur radio. Especially for persons with certain communication problems (speech impediments, Asperger's disorder and high-functioning autism, hearing-impaired, etc.), digital modes and CW are the *\*only\** ways they can use the amateur radio service; in particular, with persons with cognitive disorders such as HFA and Asperger's, even CW may be problematic as their primary method of communication may be via typed formats. (An extreme example of a person who is a nonverbal autistic whose primary method of communication is via typing is that of Amanda Baggs, who was recently featured on CNN: <http://www.cnn.com/2007/HEALTH/02/22/autism.emails/index.html>)

Eliminating HF digital modes (which would be the effect of reducing the bandwidth to 300Hz or 1.5KHz) would effectively disenfranchise these people from the amateur service entirely. Again, especially for people who are hearing impaired (and have issues learning CW) or other persons whose primary method of communication is *\*not\** verbal, packet radio is the primary method in which these people get online. This would be especially sad, considering that the CW requirement was recently removed (which opened the door for persons with auditory processing issues in general to finally obtain higher-class amateur radio licenses allowing HF privileges).

In addition, as previously noted, there are amateur radio networks used for emergencies and public safety that rely on HF data networks that would be profoundly impacted were RM-11392 approved. In particular, the HF-Link network (which is a network set up for HF data communication in the event of emergency and which uses the Automatic Link Establishment (ALE) protocol) would be profoundly impacted; it is one of the very few data protocols that does not require an external computer (the only equivalent protocol available now is Echolink, which is VHF-only), meaning that persons in areas where restrictive covenants are in place or installation of HF antennas is otherwise impossible may participate in the system. ALE would effectively be banned for non-governmental users under RM-11392; a large portion of amateur radio operators who use HF-Link as their primary method of getting onto the HF bands would be shut out, and amateur emergency radio operations would be highly impacted

and (especially as upwards of thirty percent or more of amateur radio operators presently live in complexes where CC&Rs effectively prohibit placement of outdoor antennas and a similar number live in restricted-space areas where placement of an outdoor antenna for HF is effectively impossible).

Thank you for your consideration,  
-P. Bailey-Stine

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